

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE DEUTSCHE BANK AG SECURITIES  
LITIGATION,

This Document Relates to: All Actions

Case No. 1:09-cv-1714 (DAB)  
(ECF Case)

**DECLARATION OF CHRISTINE BATEUP**

CHRISTINE BATEUP hereby declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the Bar of this Court and associated with the firm of Cahill Gordon & Reindel LLP, counsel for the Deutsche Bank and Individual Defendants in the above-referenced action.
2. I submit this declaration in support of the Deutsche Bank and Individual Defendants' Motion to Dismiss the Consolidated Amended Complaint (the "Motion").
3. Attached hereto are true and correct copies of the following documents, which are referenced in the Memorandum of Law submitted in support of the Motion. Certain of these documents are excerpted for the Court's convenience. If it would be of assistance to the Court, complete copies of the excerpted documents can be provided:

EXHIBIT A: Excerpts from Deutsche Bank AG Annual Report on Form 20-F for the period ending December 31, 2005, filed with the SEC on March 23, 2006.

EXHIBIT B: Excerpts from Deutsche Bank AG Annual Report on Form 20-F for the period ending December 31, 2006, filed with the SEC on March 27, 2007.

- EXHIBIT C: Excerpts from Deutsche Bank AG Annual Report on Form 20-F for the period ending December 31, 2007, filed with the SEC on March 26, 2008.
- EXHIBIT D: Excerpts from Deutsche Bank AG Annual Report on Form 20-F for the period ending December 31, 2008, filed with the SEC on March 24, 2009.
- EXHIBIT E: Excerpts from Deutsche Bank AG Press Release, filed with the SEC on Form 6-K on October 3, 2007.
- EXHIBIT F: Excerpts from Deutsche Bank AG Quarterly Report on Form 6-K for the quarter ending September 30, 2007, filed with the SEC on November 1, 2007.
- EXHIBIT G: Excerpts from Deutsche Bank AG Quarterly Report on Form 6-K for the quarter ending December 31, 2007, filed with the SEC on February 7, 2008.
- EXHIBIT H: Excerpts from Deutsche Bank AG Press Release, filed with the SEC on Form 6-K on April 1, 2008.
- EXHIBIT I: Excerpts from Deutsche Bank AG Quarterly Report on Form 6-K for the quarter ending March 31, 2008, filed with the SEC on April 29, 2008.
- EXHIBIT J: Excerpts from Deutsche Bank AG Quarterly Report on Form 6-K for the quarter ending June 30, 2008, filed with the SEC on July 31, 2008.
- EXHIBIT K: Excerpts from Deutsche Bank AG Quarterly Report on Form 6-K for the quarter ending September 30, 2008, filed with the SEC on October 30, 2008.
- EXHIBIT L: Transcript of a speech by Murilo Portugal, Deputy Managing Director, International Monetary Fund, at the Annual Meeting of Institute for International Finance on March 7, 2008, a copy of which is also available at <http://www.imf.org/external/np/speeches/2008/030708.htm>.
- EXHIBIT M: An article entitled *Ten Days Changed Wall Street As Bernanke Saw "Massive Failures"*, written by John Helyar, Alison Fitzgerald, Mark Pittman and Serena Saitto and published on the Bloomberg website on Sept. 22, 2008, a copy of which is also available at <http://www.bloomberg.com/apps/news?pid=20601170&sid=awekS4PaIZrw>.

- EXHIBIT N: Excerpts from a book entitled *Worldwide Financial Reporting*, written by George J. Benston, Michael Bromwich, Robert E. Litan and Alfred Wagenhofer and published in 2006.
- EXHIBIT O: Excerpts from an article entitled *Coping in a Global Marketplace: Survival Strategies for a 75-year-old SEC*, written by James D. Cox and published in the Virginia Law Review in March 2009.
- EXHIBIT P: An article entitled *The ABX Index: A Pricing Conundrum*, written by Ben Logan and published in Credit on May 1, 2008.
- EXHIBIT Q: Excerpts of a report prepared by the SEC entitled *Report and Recommendations Pursuant to Section 133 of the Emergency Economic Stabilization Act of 2008: Study on Mark-To-Market Accounting*, a copy of which is also available at <http://www.sec.gov/news/studies/2008/marktomarket123008.pdf>.
- EXHIBIT R: Financial Accounting Standards Board Staff Position FAS 157-4 entitled *Determining Fair Value When the Volume and Level of Activity for the Asset or Liability have Significantly Decreased and Identifying Transactions that are Not Orderly*, a copy of which is also available at [http://72.3.243.42/pdf/fsp\\_fas157-4.pdf](http://72.3.243.42/pdf/fsp_fas157-4.pdf).

I hereby declare under penalty of perjury that the foregoing is true and correct.

  
Christine Bateup

Executed: New York, New York  
March 26, 2010